

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Mylan N.V. Securities Litigation

No. 16-cv-07926 (JPO)

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the Amended Class Action Complaint [Dkt. #39], a copy of which is annexed hereto, the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss, the accompanying Declaration of Stefan H. Atkinson and the exhibits annexed thereto, and the accompanying Declaration of Adv. Zvi Agmon, Defendants Mylan N.V., Mylan Inc., Heather Bresch, Robert J. Coury, Paul B. Campbell, Kenneth S. Parks and John D. Sheehan hereby move this Court, before the Honorable J. Paul Oetken, United States District Court, Southern District of New York, 40 Foley Square, New York, New York 10007, for an order dismissing the Amended Class Action Complaint in its entirety and with prejudice pursuant to Federal Rules of Civil Procedure 12(b)(6), 12(b)(1), 12(b)(2) and 44.1, and on *forum non conveniens* grounds, and granting such other and further relief as the Court deems just and proper.

May 30, 2017

CRAVATH, SWAINE & MOORE LLP,

by

/s/ Sandra C. Goldstein

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